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17
18 UNITED STATES DISTRICT COURT
19
20 NORTHERN DISTRICT OF CALIFORNIA
21
22 SAN FRANCISCO DIVISION

23 In re CLOROX CONSUMER LITIGATION) Master File No. 12-cv-00280-SC
24 _____)
25 This Document Relates To:) CLASS ACTION
26 ALL ACTIONS.) JOINT STIPULATED REQUEST TO
27) EXTEND BRIEFING SCHEDULE
28) PURSUANT TO LOCAL RULES 6-2 AND
7-12

1 Pursuant to Civil Local Rules 6-2 and 7-12 of the United States District Court for the
2 Northern District of California, Plaintiffs Tina Butler-Furr, Susan Doyle, Lori Kowalewski,
3 Catherine Lenz, Kristin Luszcz, Jose Segarra, and Megan Sterritt (“Plaintiffs”) and The Clorox
4 Company (“Defendant”) stipulate as follows:

5 RECITALS

6 1. Whereas, on April 26, 2013, the Court held a case management conference and
7 entered a minute entry which scheduled a July 26, 2013 hearing on Defendant’s yet-to-be-filed
8 motion for judgment on the pleadings and directed the Parties to calculate their filing dates
9 accordingly. [Dkt. No. 70].

10 2. Whereas, the Parties subsequently agreed to a briefing schedule that allowed
11 Defendant 30 days to file its motion (May 30, 2013) and 30 days for Plaintiffs to respond to the
12 motion (June 27, 2013). The Parties further agreed that the Defendants would have two weeks to
13 file a reply (July 11, 2013).

14 3. Whereas, on May 30, 2013, per the Parties’ agreement, Defendant filed its
15 Motion for Judgment on the Pleadings. On that same day, the Court generated a briefing
16 schedule which required Responses due by June 13, 2013 and Replies due by June 20, 2013.

17 4. Whereas, pursuant to their original agreement, the Parties seek to extend
18 Plaintiffs’ deadline for submission of their response to Defendant’s Motion for Judgment on the
19 Pleadings by an enlargement of 14 days and Defendant’s reply to Plaintiffs’ response by an
20 enlargement of time of 21 days. If granted, Plaintiffs’ response will be due on June 27, 2013,
21 and Defendant’s reply will be due on July 11, 2013.

22 5. Whereas, Civil Local Rule 6.2 provides, in relevant part, that a stipulated request
23 to extend time must (1) set forth with particularity, the reasons for the requested enlargement or
24 shortening of time; (2) disclose all previous time modifications in the case, whether by
25 stipulation or Court order; and (3) describe the effect the requested time modification would have
26 on the schedule for the case.

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1 6. Whereas, (1) the Parties are in need of the extensions of time to file their response
2 and reply based on the numerous arguments raised in the Defendant's Motion that involve the
3 application of multiple state laws. If the requested extension is not granted, the Parties will be
4 prejudiced in their ability to respond and reply to the pending motion. Moreover, (2) there have
5 been no other previous time modifications in the case, and (3) the requested modifications will
6 have no impact on the schedule for the case.

7 7. Whereas, this extension is requested in good faith and not for the purposes of
8 delay.

STIPULATION

10 1. The deadline for submission of Plaintiffs' response to Defendant's Motion for
11 Judgment on the Pleadings shall be extended to June 27, 2013;

12 2. The deadline for submission of Defendant's reply shall be extended to July 11,
13 2013.

14

15 || Respectfully submitted,

16 | DATED: June 7, 2013

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39 DATED: June 7, 2013

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44 *s/Kenneth K. Lee*
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Attorneys for Defendant

[PROPOSED] ORDER

Pursuant to Civil Local Rules 6-2 and 7-12 of the United States District Court for the Northern District of California, the Court hereby extends the time for Plaintiffs to file their responses to Defendant's Motion for Judgment on the Pleadings [Dkt. No.71] until June 27, 2013, and for Defendant to file its reply until July 11, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 06/07/2013

